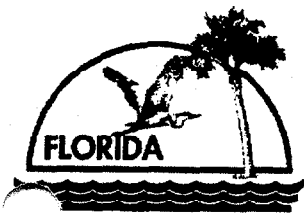


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NAS WHITING FIELD  
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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION REGARDING FINAL DRAFT FEASIBILITY STUDY SITE 2 NORTHWEST  
OPEN DISPOSAL AREA NAS WHITING FIELD FL  
8/5/1998  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



# Department of Environmental Protection

09.01.02.0002

00408

Lawton Chiles  
Governor

Twin Towers Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

August 5, 1998

Ms. Linda Martin  
Department of the Navy, Southern Division  
Naval Facilities Engineering Command  
2155 Eagle Drive, PO Box 190010  
North Charleston, SC 29419-9010

file: fs@2a.doc

RE: Final Draft Feasibility Study Site 2, Northwest Open Disposal Area, NAS Whiting Field

Dear Ms. Martin:

Mr. Greg Brown, P.E., and I have reviewed above document dated July 1988 (received July 21, 1998). Mr. Brown's comments are attached. Mr. Brown's and my comments which follow should be addressed by the Navy in the final document:

1. Section 2.2 Identification of RAOs, page 2-8: this section appears to be continued on page 2-10 after Table 2-3. Please evaluate and correct this as necessary. It appears that Table 2-3 should be corrected with respect to beryllium since the new cleanup target levels, as represented in Chapter 62-785, F.S. are greater than the old Florida Soil Cleanup Guidelines; additionally, the RAOs should be re-evaluated as necessary.
2. Section 2.1.1 Chemical-Specific ARARs: Florida has promulgated default soil cleanup target levels in Chapter 62-785, F.A.C. Since these default levels represent the Department's most current derivation of target levels, please insert this information in this section, in Table 2-1 and other appropriate sections as needed in place of references to the 1995 Soil Cleanup Goals. Place the rule reference in the Reference section. Finally, please consider and document the effect of these default cleanup target levels on the site and the proposed actions in the Feasibility Study.
3. Page 2-10, discussion of Surface Soil: this paragraph contains errors in that Florida now has promulgated soil cleanup target levels (see previous comment) which are applicable to subsurface soils. Florida uses the upper 2 feet of soils as a guide for direct exposure scenarios. This does not mean that contamination below that level does not have to be considered; in the case of site ground water contamination by a contaminant, the appropriate leachability criteria must be applied to the surface and subsurface soil.
4. I recognize that the ground water at NAS Whiting Field has been named as a separate unit; however, for clarity and for the record, please assure that we have adequately shown

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Ms. Linda Martin

Page Two

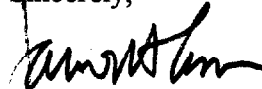
August 5, 1998

that the proposed remedy or recommendation is consistent with any ground water contamination at Site 2. Once the remedy is in place, we don't want to discover in the future ground water evaluation that we should have addressed the problem in the approved remedy for this site. If the evaluation shows that is that there is no problem in this regard, please clearly state that this is the case. In my review of Table 2-2, it appears that of the two ground water contaminants at Site 2, aluminum and iron, iron exceeds the "2 times the arithmetic mean of background concentration" guideline which would indicate that the iron may be site related. This should be properly considered and addressed, notably in Section 5.2.2.

5. Section 4.2.1., page 4-4: references to deed restrictions are not applicable in this document. Please remove them.
6. Section 4.2.2. Long Term Effectiveness and Permanence: the discussion of how "biological activity" may reduce concentrations of soil contaminants appears to be inappropriate, considering that arsenic is the primary soil contaminant.
7. Section 5.2.2: paragraph 3 should include (following "Whiting Field") this statement - "Alternative 2 carries with it long-term agreement conditions including periodic re-evaluation requirements."
8. Appendix B: Please utilize the official signed correspondence for this section.

Thank you for the opportunity to review this document. If you have questions or require further clarification, please contact me at (904) 921-4230.

Sincerely,



James H. Cason, P.G.  
Remedial Project Manager

Attachment (1)

cc: Craig Benedikt, USEPA Atlanta  
Jim Holland, NAS Whiting Field

TJB B JJC B JESN B for ESN

## Memorandum

# Florida Department of Environmental Protection

**TO:** Jim Cason, P.G., Remedial Project Manager, Technical Review Section

**THROUGH:** Tim Bahr, P.G., Supervisor, Technical Review Section *TB*

**FROM:** Greg Brown, P.E., Professional Engineer II, *GB*  
Technical Review Section

**DATE:** August 5, 1998

**SUBJECT:** Final Draft Feasibility Study, Site 2, Northwest Open Disposal Area, NAS Whiting Field, Milton, Florida.

I reviewed the subject document dated June, 1998 (received June 22, 1998). It is adequate for its intent as a draft document. In addition to your comments, I have the following comments for consideration in the final feasibility study:

1. Alternative 2: Site Closure, lists "deed restriction" as an activity. Proprietary controls such as deed restrictions are not applicable at active federal facilities.
2. Alternative 2: Site Closure, specifies a "closure and post-closure plan." A well prepared site-specific LUCIP should suffice for this. Separate closure and post-closure plans do not appear necessary.

If you have any questions, please call me at (850) 488-3935.